1	WRIGHT, FINLAY & ZAK, LLP		
1	Ramir M. Hernandez, Esq. Nevada Bar No. 13146		
2	7785 W. Sahara Ave., Suite 200		
3	Las Vegas, NV 89117		
4	(702) 475-7964; Fax: (702) 946-1345 rhernandez@wrightlegal.net		
5	Attorneys for Defendant, Conn Appliances, Inc.		
6 7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
	I EON ATVING	Case No.: 2:23-cv-00316-APG-BNW	
8	LEON ATKINS,	Case No.: 2:23-6V-00310-APG-BNW	
9	Plaintiff,	JOINT MOTION TO EXTEND	
10	vs.	DEADLINE TO RESPOND TO PLAINTIFF'S COMPLAINT (SECOND	
11	EQUIEA V INFORMATION CERVICES, LLC	REQUEST)	
12	EQUIFAX INFORMATION SERVICES, LLC AND CONN CREDIT CORPORATION, INC.,		
13	Defendants.		
14			
15	Plaintiff, Leon Atkins ("Plaintiff"), and Defendant, Conn Appliances, Inc. ("Defendant"		
16	(collectively "Parties"), by and through their counsel of record, hereby stipulate and agree a		
17	follows:		
18	On February 28, 2023, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served		
19	with Plaintiff's Complaint on March 16, 2023. The current deadline for Defendant to respond to		
20	Plaintiff's Complaint is May 5, 2023. The Parties have discussed extending the deadline fo		
21	Defendant to respond to Plaintiff's Complaint to allow for better investigation of the allegations		
22	and discuss possible resolution of the matter.		
23	WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to		
24	file its responsive pleading to Plaintiff's Complaint to June 5, 2023.		
25	This is the second motion for an extension of time for Defendant to file its responsive		
26	pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to		
27	any other party.		
28	As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that		

Case 2:23-cv-00316-APG-BNW Document 14 Filed 05/11/23 Page 2 of 3

1	occurs during the pendency of this extension.	
2	DATED this 10th day of May, 2023.	
3		
4	WRIGHT, FINLAY & ZAK, LLP	FREEDOM LAW FIRM
5	/s/ Ramir M. Hernandez	/s/ Gerardo Avalos
6	Ramir M. Hernandez, Esq. Nevada Bar No. 13146	Gerardo Avalos, Esq. Nevada Bar No. 15171
7	7785 W. Sahara Ave., Suite 200	8985 S. Eastern Ave. Suite 350
8	Las Vegas, NV 89117 Attorneys for Defendant, Conn Appliances,	Las Vegas, NV 89123 Attorneys for Plaintiff, Leon Atkins
9	Inc.	
10		
11		
12		
13		IT IS SO ORDERED:
14		Berbweter
15		UNITED STATES MAGISTRATE JUDGE
16		May 11, 2023
17		DATED:
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
	Page 2 of 3	

CERTIFICATE OF SERVICE I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (SECOND REQUEST) on the 10th day of May, 2023, to all parties on the CM/ECF service list. /s/ Lisa Cox An Employee of WRIGHT, FINLAY & ZAK, LLP